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Reply To: PHILADELPHIA

August 26, 2005

**Via E-Mail: jscholnick@schiffhardin.com, ajacob@schiffhardin.com**

John Scholnick  
Schiff Hardin, LLP  
6600 Sears Tower  
Chicago, Illinois 60606

**Re: *In re Terrorist Attacks of September 11, 2001***  
**03 MDL 1570 (RCC)**  
***Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al.***  
**04 CV 1923 (RCC)**  
***Estate of John P. O'Neill, Sr., et al. v. Republic of Iraq, et Al.***  
**04 CV 1076 (RCC)**

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Dear Mr. Scholnick:

On Wednesday, August 24, 2005, Ayad Jacob, Esquire requested an extension of time for Defendants, Schreiber and Zindel, Frank Zindel, Engelbert Schreiber and Engelbert Schreiber, Jr. ("Defendants"), to file their Reply to the Plaintiff's Opposition to the Defendants' Motion to Dismiss ("Reply"), based upon the reasoning that "a number of conflicts have arisen that make it difficult for me to meet the current schedule." Plaintiffs agreed to the extension.

However, in light of your August 25, 2005 letter Reply to the court, addressing issues raised in our Response, Plaintiffs assume that you were able to resolve same, and this letter Reply constituted Defendants Reply to Plaintiff's Opposition to the Defendants' Motion to Dismiss. Thereby, we expect that your request is now moot.

Due to the Plaintiffs position regarding your Reply, it is necessary to inform you that if a stipulation is tendered, as relating to Mr. Jacob's request, the Plaintiffs will not agree to sign such a stipulation.

Thank you for your assistance with this matter.

**LAW OFFICES OF JERRY S. GOLDMAN & ASSOCIATES, P.C.**

August 26, 2005

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Very truly yours,

**LAW OFFICES OF JERRY S. GOLDMAN &  
ASSOCIATES, P.C.**

By: \_\_\_\_\_  
GINA M. MAC NEILL, ESQUIRE

GMM:jf

Enc. a/s

cc: Jerry S. Goldman, Esquire